## REMARKS

The Office Action mailed November 15, 2004 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 13-20 are now pending in this application. Claims 13-20 stand rejected. Claims 13-20 have been amended. No new matter has been added.

The objection to the drawings is respectfully traversed. Applicant has amended the specification to delete a reference numeral '20'. Accordingly, Applicant respectfully requests that the objection to the drawings be withdrawn.

The objection to the title is respectfully traversed. Applicant has amended the title. Accordingly, Applicant respectfully requests that the objection to the title be withdrawn.

The rejection of Claims 13-20 under 35 U.S.C. § 103 as being unpatentable over Snyder et al. (U.S. Patent No. 6,357,220) in view of either Fredd (U.S. Patent No. 4,117,563) is respectfully traversed.

Snyder et al. describe a plurality of links that extend to, and are attached to, first and second brackets (68, 70), which are hard mounted to a gas turbine engine case. A clevis (78) at an end of each of the links is pivotally coupled to a plate via a bolt (79) received within a bushing (76) and threaded into mating holes formed in the clevis. A grommet (74) is received within the bushing to facilitate damping vibrations between an accessory mounted to a gearbox and the links.

Fredd describes tubular members (37 and 38) that are threadedly interconnected to form an improved pressure-sealed joint. Specifically, the members include matched straight-tapered-straight (STS) thread profiles for external threads of the tubular member (37) and internal threads of the tubular member (38). Matching tapered threads (40 and 43) form a tight sealing region in a manner of standard tapered interconnections because of compressive stress imparted by the make-up.

Claim 13 recites a gas turbine engine system comprising "a gas turbine engine; and a thrust link comprising a first connector, a second connector, and a span section extending therebetween, said first connector comprising a first side, a second side, and an opening extending therebetween and defined by an inner surface, said inner surface comprising a plurality of threads extending radially outward into said connector opening such that said threads are axially spaced substantially constant along said inner surface, said plurality of threads comprises a first thread portion positioned proximate said first side and initially engaging a threaded apparatus coupled to said first connector, said plurality of threads comprising a cutback, wherein said cutback extends through said first thread portion, said first connector coupled to said turbine engine, said cutback configured to reduce stresses induced into said plurality of threads."

Neither Synder et al. nor Fredd, considered alone or in combination, describe or suggest a gas turbine engine system as recited in Claim 13. Specifically, neither Snyder et al. nor Fredd, considered alone or in combination, describe or suggest the first connector coupled to the turbine engine, the cutback configured to reduce stresses induced into the plurality of threads. Rather, Snyder et al. describe a clevis at the end of each of a plurality of links that extend and are attached to first and second brackets, which are hard mounted to a case of a gas turbine engine. Synder et al. also describe a grommet that damps out vibrations between an accessory mounted to a gearbox and the links. Accordingly, Synder et al. does not describe or suggest the cutback formed within the plurality of threads of the first connector and configured to reduce stresses induced into the plurality of threads. Fredd describes matching tapered threads within tubular members. Accordingly, Fredd does not describe or suggest the turbine engine and therefore, does not describe or suggest the cutback formed within the plurality of threads of the first connector coupled to the turbine engine. Accordingly, for at least the reasons set forth above, Claim 13 is submitted to be patentable over Snyder et al. in view of Fredd.

Claims 14-20 depend from independent Claim 13. When the recitations of Claims 14-20 are considered in combination with the recitations of Claim 13, Applicant submits that dependent Claims 14-20 likewise are patentable over Snyder et al. in view of Fredd.

For the reasons set forth above, Applicant respectfully requests that the Section 103 rejection of Claims 13-20 over Snyder et al. in view of Fredd be withdrawn.

The rejection of Claims 13-20 under 35 U.S.C. § 103 as being unpatentable over Snyder et al. in view of either Bonstein (U.S. Patent No. 5,014,411) or Sugimura (U.S. Patent No. 4,958,973) is respectfully traversed.

Snyder et al. is described above.

Bonstein describes a system in which an interference can be established with precision such that an amount of torque necessary to thread a bolt through a nut falls within a predetermined range. For example, for a 3/8-24 nut, the torque range specified in the aerospace industry is 9 1/2 to 40 inch-pounds.

Sugimura describes an accumulator (ACC) in which an interior of a vessel main body (10) is partitioned by a bladder (11) into a gas chamber (12) and a liquid chamber (13), and opposite end portions (14 and 15) of the main body are closed by side plates (16 and 17). On the inside of the end portion (14) of the vessel main body is formed a female screw (20) to be mated with a male screw (19) of the side plate (16).

Claim 13 recites a gas turbine engine system comprising "a gas turbine engine; and a thrust link comprising a first connector, a second connector, and a span section extending therebetween, said first connector comprising a first side, a second side, and an opening extending therebetween and defined by an inner surface, said inner surface comprising a plurality of threads extending radially outward into said connector opening such that said threads are axially spaced substantially constant along said inner surface, said plurality of threads comprises a first thread portion positioned proximate said first side and initially engaging a threaded apparatus coupled to said first connector, said plurality of threads comprising a cutback, wherein said cutback extends through said first thread portion, said first connector coupled to said turbine engine, said cutback configured to reduce stresses induced into said plurality of threads."

None of Snyder, Bonstein and Sugimura, considered alone or in combination, describe or suggest a gas turbine engine system as recited in Claim 13. Specifically, none of Snyder et al., Bonstein and Sugimura, considered alone or in combination, describe or suggest the first connector coupled to the turbine engine, the cutback configured to reduce stresses induced into the plurality of threads. Rather, Snyder et al. describe a clevis at the end of each of a plurality of links that extend and are attached to first and second brackets, which are hard mounted to a case of a gas turbine engine. Synder et al. also describe a grommet that damps out vibrations between an accessory mounted to a gearbox and the links. Accordingly, Synder et al. does not describe or suggest the cutback formed within the plurality of threads of the first connector and configured to reduce stresses induced into the plurality of threads. Bonstein describes a nut used in the aerospace industry. Accordingly, Bonstein does not describe or suggest a turbine engine and therefore, does not describe or suggest the cutback formed within the plurality of threads of the first connector coupled to the turbine engine. Sugimura describes a female screw formed on the inside of an end portion of a vessel main body of an accumulator. Accordingly, Sugimura does not describe or suggest a turbine engine and therefore, does not describe or suggest the cutback formed within the plurality of threads of the first connector coupled to the turbine engine. Accordingly, for at least the reasons set forth above, Claim 13 is submitted to be patentable over Snyder et al. in view of either Bonstein or Sugimura.

Claims 14-20 depend from independent Claim 13. When the recitations of Claims 14-20 are considered in combination with the recitations of Claim 13, Applicant submits that dependent Claims 14-20 likewise are patentable over Snyder t al. in view of either Bonstein or Sugimura.

For the reasons set forth above, Applicant respectfully requests that the Section 103 rejection of Claims 12-20 over Snyder et al. in view of either Bonstein or Sugimura be withdrawn.

The rejection of Claims 12-20 under 35 U.S.C. § 103 as being unpatentable over Nash et al. (U.S. Patent No. 4,571,936) in view of Snyder et al. in view of any of Fredd, Bonstein, and Sugimura is respectfully traversed.

Snyder et al. Fredd, Bonstein, and Sugimura are described above.

Nash et al. describe a link for a rear portion of a core engine (102). The link includes a body portion (200) and a pair of link terminals (202 and 204). A pair of annular faces are formed on outer portions of ball members (222 and 224) for engagement with surfaces located adjacent the ball mountings or with the head of a threaded bolt or other fastening device attached to an area of structural reinforcement (120) and to rear attachment points (121) on the core engine. Holes (230 and 232) within the ball members receive threaded bolts, studs, pins, or whatever fastening members are elected for engagement.

Claim 13 recites a gas turbine engine system comprising "a gas turbine engine; and a thrust link comprising a first connector, a second connector, and a span section extending therebetween, said first connector comprising a first side, a second side, and an opening extending therebetween and defined by an inner surface, said inner surface comprising a plurality of threads extending radially outward into said connector opening such that said threads are axially spaced substantially constant along said inner surface, said plurality of threads comprises a first thread portion positioned proximate said first side and initially engaging a threaded apparatus coupled to said first connector, said plurality of threads comprising a cutback, wherein said cutback extends through said first thread portion, said first connector coupled to said turbine engine, said cutback configured to reduce stresses induced into said plurality of threads."

None of Nash et al., Snyder et al., Fredd, Bonstein, and Sugimura, considered alone or in combination, describe or suggest a gas turbine engine system as recited in Claim 13. Specifically, none of Nash et al., Snyder et al., Fredd, Bonstein, and Sugimura, considered alone or in combination, describe or suggest the first connector coupled to the turbine engine, the cutback configured to reduce stresses induced into the plurality of threads. Rather, Nash et al. describe holes that receive threaded bolts, studs, pins, or whatever fastening members are elected for engagement. The holes are formed within ball members, which have a pair of annular faces for engagement with rear attachment points on a core engine. Accordingly, Nash et al. does not describe or suggest the cutback configured to reduce stresses induced into the plurality of threads. Snyder et al. describe a clevis at the end of each of a plurality of links that extend and are attached to first and second brackets, which are hard mounted to a case of a gas turbine engine. Synder et al. also describe a grommet that damps out vibrations between an accessory mounted to a gearbox and the links. Accordingly, Synder et al. does not describe or suggest the cutback formed within the plurality of threads of the first connector and configured to reduce stresses induced into the plurality of threads. Fredd describes matching tapered threads within tubular members. Accordingly, Fredd does not describe or suggest the turbine engine and therefore, does not describe or suggest the cutback formed within the plurality of threads of the first connector coupled to the turbine engine. Bonstein describes a nut used in the aerospace industry. Accordingly, Bonstein does not describe or suggest a turbine engine and therefore, does not describe or suggest the cutback formed within the plurality of threads of the first connector coupled to the turbine engine. Sugimura describes a female screw formed on the inside of an end portion of a vessel main body of an accumulator. Accordingly, Sugimura does not describe or suggest the cutback formed within the plurality of threads of the first connector coupled to the turbine engine. Accordingly, for at least the reasons set forth above, Claim 13 is submitted to be patentable over Nash et al. in view of Snyder et al. in view of any of Fredd, Bonstein, and Sugimura.

Claims 14-20 depend from independent Claim 13. When the recitations of Claims 14-20 are considered in combination with the recitations of Claim 13, Applicant submits that dependent Claims 14-20 likewise are patentable over Nash et al. in view of Snyder et al. in view of any of Fredd, Bonstein, and Sugimura.

For the reasons set forth above, Applicant respectfully requests that the Section 103 rejection of Claims 13-20 over Nash et al. in view of Snyder et al. in view of any of Fredd, Bonstein, and Sugimura be withdrawn.

Moreover, Applicant respectfully submits that the Section 103 rejections of Claims 13-20 are not proper rejections. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combinations. None of Nash et al., Snyder et al., Fredd, Bonstein, and Sugimura, considered alone or in combination, describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicant respectfully submits that it would not be obvious to one skilled in the art to combine Nash et al. with Snyder et al., Fredd, Bonstein, or Sugimura because there is no motivation to combine the references suggested in the cited art itself.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicant's disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicant's disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion or motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejections are based on combinations of teachings selected from multiple patents in an attempt to arrive at the claimed invention. Specifically, Nash et al. describe holes that receive threaded bolts, studs, pins, or whatever fastening members are elected for engagement. The holes are formed within ball members, which have a pair of annular faces for engagement with rear attachment points on a core engine. Snyder et al. describe a clevis at the end of each of a plurality of links that extend and are attached to first and second brackets, which are hard mounted to a case of a gas turbine engine. Synder et al. also describe a grommet that damps out vibrations between an accessory mounted to a gearbox and the links. Fredd describes matching tapered threads within tubular members. Bonstein describes a nut used in the aerospace industry. Sugimura describes a female screw formed on the inside of an end portion of a vessel main body of an accumulator. Since there is no teaching nor suggestion in the cited art for the combinations, the Section 103 rejections appear to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such combinations are impermissible, and for this reason alone, Applicant requests that the Section 103 rejections of Claims 13-20 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,

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